

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Kayla Lesse : No. 18-10096-MDC
Debtor :

ANSWER TO MOTION OF PENNSYLVANIA HOUSING FINANCE AGENCY FOR
RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362
AND CERTIFICATE OF SERVICE

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted the payments were missed. Denied that fees are owed.
8. Admitted in part denied in part. Debtor intends to file a motion to modify to cover the missed payments as a result of missing Trustee payments due to Covid and missing mortgage payments due to job loss from Covid.
9. No objection.
10. Admitted.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 09/17/2021

A copy of this Answer is being served on Rebecca Ann Solarz, Esquire, and the Chapter 13 Trustee.